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Attorneys for Defendants and Counterclaimants
CHEVRONTEXACO CORPORATION and
TEXACO INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

SIMON GILL and WILLIAM HATCHER,
Plaintiffs,

v.

CHEVRONTEXACO CORPORATION, a
Delaware corporation, TEXACO INC., a
Delaware corporation, and DOES 1 - 10,
inclusive,

Defendants.

CHEVRONTEXACO CORPORATION and
TEXACO INC.,

Defendants and Counterclaimants,

v.

SIMON GILL,

Plaintiff and Counter-Defendant.

Consolidated Case No. 1:05-cv-00272-
OWW-LJO

STIPULATION FOR DISMISSAL OF
ENTIRE ACTION WITH PREJUDICE;
ORDER THEREON

Courtroom: 3 (7th Floor)
Judge: Hon. Oliver W. Wanger

1 WHEREAS, on or about November 11, 2006, Plaintiff and Counter-Defendant
2 Simon Gill ("Gill"), and Defendants and Counterclaimants Texaco Inc. and ChevronTexaco
3 Corporation (collectively "ChevronTexaco") entered into a Settlement Agreement and
4 General Release (the "Settlement"), pursuant to which Gill and ChevronTexaco agreed to
5 settle all claims each may have against the other in this action;

6 NOW THEREFORE, IT IS HEREBY STIPULATED by and between the parties
7 hereto, through their respective attorneys of records, pursuant to Federal Rules of Civil
8 Procedure 41(a)(1) and (c), subject to the approval and order of the United States District
9 Court as follows:

10 1. Gill's complaint herein and ChevronTexaco's counterclaim herein are
11 hereby dismissed in their entirety with prejudice;

12 2. Each party shall bear its or his own costs and attorney fees associated with
13 this action; and
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3. This dismissal disposes of all parties and all causes of action.

Dated: November 28, 2006

PILLSBURY WINTHROP SHAW PITTMAN LLP
RICHARD M. SEGAL
BRIAN D. MARTIN

By /s/ Brian D. Martin

Attorneys for Defendants and Counterclaimants
CHEVRONTXACO CORPORATION
and TEXACO INC.

Dated: November 28, 2006.

ALEXANDER & ASSOCIATES, PLC
WILLIAM L. ALEXANDER

By /s/ William L. Alexander

Attorney for Plaintiff and Counter-Defendant SIMON
GILL

ORDER

Upon stipulation of the parties and good cause appearing therefor,

IT IS SO ORDERED.

Dated: _December 4,___ 2006.

/s/ OLIVER W. WANGER

Honorable Oliver W. Wanger
United States District Court Judge